

Tracy Hendershott  
Pro Se Creditor  
Florida, USA

Trevor Brucker  
Pro Se Creditor  
Minnesota, USA

**UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK**

	)	
In re:	)	Chapter 11
	)	
Voyager Digital Holdings, Inc, et al., <sup>1</sup>	)	Case No. 22-10943 (MEW)
	)	
Creditors	)	(Jointly Administered)
	)	

**MOTION TO RELEASE UNREDACTED VERSION OF “NOTICE OF FILING OF REDACTED OBJECTION OF THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS TO DEBTORS’ MOTION FOR ENTRY OF AN ORDER APPROVING (I) THE ADEQUACY OF THE AMENDED DISCLOSURE STATEMENT, (II) SOLICITATION AND NOTICE PROCEDURES, (III) FORMS OF BALLOTS AND NOTICES IN CONNECTION THEREWITH, AND (IV) CERTAIN DATES WITH RESPECT THERETO” (DOC #526), TO RELEASE SPECIAL COMMITTEE SUMMARY REPORTS INTO INVESTIGATION OF DEBTOR ACTIONS, AND OBJECT TO REDACTION OF “MOTION OF THE DEBTORS FOR ENTRY OF AN ORDER AUTHORIZING THE DEBTORS TO REDACT AND FILE UNDER SEAL CERTAIN CONFIDENTIAL INFORMATION RELATED TO DEBTORS’ OBJECTION TO MOTION OF CELSIUS NETWORK LLC FOR ORDER (I) LIFTING THE AUTOMATIC STAY PURSUANT TO 11 U.S.C. 362(D)(1) AND BANKRUPTCY RULE 4001 AND (II) GRANTING LEAVE TO FILE LATE PROOF OF CLAIM PURSUANT TO BANKRUPTCY RULES 3003(C) AND 9006(B)(1)” (DOC #892)**

The above-captioned creditors and Ponzi scheme victims (the “Creditors”) state the following in support of this motion (this “Motion”):

<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: Voyager Digital Holdings, Inc. (7687); Voyager Digital Ltd. (7224); and Voyager Digital, LLC (8013). The location of the Debtors’ principal place of business is 33 Irving Place, Suite 3060, New York, NY 10003.

**RELIEF REQUESTED**

1. The Creditors seek entry of an order, substantially in the form attached hereto as Exhibit A (the “Order”), requiring McDermott Will and Emery (as agents of the Voyager UCC) to (a) unredact and release Docket #526 “NOTICE OF FILING OF REDACTED OBJECTION OF THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS TO DEBTORS’ MOTION FOR ENTRY OF AN ORDER APPROVING (I) THE ADEQUACY OF THE AMENDED DISCLOSURE STATEMENT, (II) SOLICITATION AND NOTICE PROCEDURES, (III) FORMS OF BALLOTS AND NOTICES IN CONNECTION THEREWITH, AND (IV) CERTAIN DATES WITH RESPECT THERETO” into the public record immediately, due to active voting of PLAN.

2. The Creditors seek entry of an order, substantially in the form attached hereto as Exhibit B (the “Order”), requiring Quinn Emmanuel (acting as agents of the Debtors) and FTI Consulting (acting as agents of the UCC) release the Special Investigation summary reports as evidentiary finding into the public court record immediately due to active voting of PLAN.

**JURISDICTION AND VENUE**

3. The United States Bankruptcy Court for the Southern District of New York (the “Court”) has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334 and the Amended Standing Order of Reference from the United States District Court for the Southern District of New York, entered February 1, 2012. The Creditors confirm their consent to the Court entering a final order in connection with this Motion to the extent that it is later determined that the Court, absent consent of the parties, cannot enter final orders or judgments in connection herewith consistent with Article III of the United States Constitution.

4. Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

5. The bases for the relief requested herein are sections 107(a), 107(b), and of title 11 of the United States Code (the “Bankruptcy Code”), rule 9018 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and rules 9013-1, 9018-1, and 9037-1 of the Local Bankruptcy Rules for the Southern District of New York (the “Local Rules”).

6. The Debtors are liquidating and have no intention or possibility of continuing as an ongoing business entity due to operating an illegal earned interest program, which is causing the SEC to file formal charges amongst the Debtors industry peers for the exact same actions. Additionally, as defined by Black’s Law Dictionary, 9th edition, 2009 <sup>2</sup>; the Debtors also operated as a Ponzi scheme. Finally, the Debtors released false and misleading advertisements <sup>3</sup> and testimonies <sup>4</sup>, to entice additional investors and customers into their scheme. These chapter 11 cases have been consolidated for procedural purposes only and are jointly administered pursuant to Bankruptcy Rule 1015(b) [Docket No. 18].

### **BACKGROUND**

7. May we first begin by pleading with your Honor, as Pro Se creditors with zero bankruptcy or legal training, you please honor the SCOTUS request of granting non-represented creditors "special solicitude" and "to be given a liberal construction". We plead that if formatting or process is inadequate in this filing, please grant us opportunity to correct versus dismissal.

2. “A fraudulent investment scheme in which money contributed by later investors generates artificially high dividends or returns for the original investors, whose example attracts even larger investments. Money from the new investors is used directly to repay or pay interest to earlier investors, [usually] without any operation or revenue-producing activity other than the continual [deposit] of new funds.”

3. <https://www.fdic.gov/news/press-releases/2022/pr22056.html>

4. <https://cases.stretto.com/public/x193/11753/PLEADINGS/1175301092380000000090.pdf> (attachment 2)

8. In a civil democratic society, the public's trust in the judicial system is paramount to the very foundation of our American experience. Without that foundation of trust from the public, disputes that can not be resolved by individual parties or via legislative bodies, can easily result in disorder, decay of the fabric of society and even bloodshed. This is evident in many parts of the world that historically has not, and currently does not, have an equitable judicial system to the U.S. Key to this foundation of trust from the public, is open access to the judicial process and documentation. Secrecy (in this case from an overabundance of redactions) destroys that public trust. The Supreme Court has stated as much in their rulings ““people in an open society do not demand infallibility from their institutions . . . it is difficult for them to accept what they are prohibited from observing.”<sup>5</sup> This has been codified and precedence established since the writing of the 1st amendment to the Constitution and repeatedly with Supreme Court and Federal Court rulings in the centuries since.

9. As Creditors, our Constitutional and Federal Court rights for full access to court documentation and evidence, is made even more important in this case, due to the inclusion of 100% releases or immunity being demanded by the Debtors, in exchange for releasing our crypto assets, that they are currently holding hostage. They have used their official court appointed/approved roles to force us to make a decision on whether we vote Yes to receive access to our long locked assets but only if we grant the Debtors (including the Board, Executives and all employees) plus every single professional organization (including all their

5. Richmond Newspapers, Inc. v. Virginia, 448 U.S. 555, 572 (1980)

Partners, Executives and employees) being paid out of our estate, plus every single member of the UCC. The only way to vote No to these releases is by voting No to the Plan. This is the very definition of coercion.<sup>6</sup> If we don't grant them full immunity, they will continue to withhold our investments and continue depleting our estate with their professional fees. To further insult the Creditor class, the Professionals (Quinn Emmanuel, Kirkland & Ellis, McDermott Will & Emory, FTI Consulting and now including Paul Hastings) depleted over \$10 million in Creditor assets performing these investigations and motions, and the Creditors have not received a single insight or knowledge to make informed decisions, from any of it.

11. These facts are what make this motion of critical importance and of critical urgency with resolution, before voting begins and concludes. The Creditors need full access to all the Court documentation and evidence compiled in this case, as the Court sees fit to release to us. All future requests for redaction, have to be weighted against the severe infringements on our rights, that they automatically represent. We need this information prior to submitting our votes for the coercive Asset Purchase Agreement.

### **BASIS FOR RELIEF**

12. Public access (including creditor access rights) to court documentation is well established, existing since the draft of the Constitution and 1st Amendment and reinforced in the centuries

6. **§ 11.406 Criminal coercion.** (a) A person is guilty of criminal coercion if, with purpose to unlawfully restrict another's freedom of action to his or her detriment, he or she threatens to:

(a1) Commit any criminal offense; or (a2) Accuse anyone of a criminal offense; or (a3) Take or withhold action as an official, or cause an official to take or withhold action. (b) Criminal coercion is classified as a misdemeanor.

since then.<sup>7, 8, 9, 10, 11</sup> In addition, and directly relevant to the Special Investigations and other redacted motions, the Supreme Court has ruled public access to the records is critical in ensuring the validity of fact finding, and identifying cases of potential or factual perjury.<sup>12</sup> All of these rights have been taken away from both the Creditors and the public at large, and relief is requested as remedy.

13. The Creditors (and public at large) understand that full disclosure is not an absolute right though. Courts have recognized exceptions where the public rights do not outweigh the individual rights. These are codified in 107(a), 107(b), and of title 11 of the United States Code (the “Bankruptcy Code”), rule 9018 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and rules 9013-1, 9018-1, and 9037-1 of the Local Bankruptcy Rules for the Southern District of New York (the “Local Rules”). These rules all include the word “*may*” which does not mandate but allows the Court to approve redaction and withholding of documentation into the record. The commonality across these rules is the following exceptions where the Court is authorized to overrule the larger public Constitutional rights, for the sole individual or entity:

7. PressEnterprise I, 464 U.S. 501; Press-Enterprise Co. v. Superior Court, 478 U.S. 1 (1986) (First Amendment right of access applied to transcripts of voir dire proceedings)

8. Rushford v. New Yorker Magazine, Inc., 846 F.2d 249, 253 (4th Cir. 1988) (“We believe that the more rigorous First Amendment standard should also apply to documents filed in connection with a summary judgment motion in a civil case.”)

9. Brown & Williamson Tobacco Corp. v. Federal Trade Comm’n, 710 F.2d 1165, 1179 (6th Cir. 1983) (administrative record and other documents filed in connection with pretrial motions)

10. In re Continental Illinois Securities Litigation, 732 F.2d 1302, 1308 (7th Cir. 1983) (report of special litigation committee formed to evaluate shareholder derivative claims, filed in connection with motion to terminate claims)

11. Publicker Industries, Inc., 733 F.2d at 1074 (closure of hearing on motion for preliminary injunction and sealing of hearing transcript violated First Amendment)

12. Richmond Newspapers, Inc. v. Virginia, 448 U.S. at 596-97 (Brennan, J., concurring)

- a) Protection of an entity's existence and viability by ensuring their trade secrets, confidential research, developments and commercial information is not shared with competitors.
- b) Protect an entity in regards to scandalous or defamatory matter.

14. Your Honor, breaking these exceptions out individually, you will see neither are relevant in this case and are not justifiable for overruling the Constitutional rights of public access.

- a) Protection of entity's existence and viability: The Debtor's charade of reorganization or establishing a Stand Alone plan has been revealed as false long ago. Due to their actions of fiduciary and risk management malfeasance against their investors and creditors, they have lost the public and investor trust. Due to their actions of regulatory non-compliance with the Earned Interest Program, they have received numerous State cease and desist orders. Through these actions and many more self inflicted on themselves and their customers, there is zero chance of them emerging from these proceedings as an on-going entity.

Hence, there is no risk the Debtors face from damages resulting from complying with the Constitutional requirement of full and active access to court filings and Special Committee investigations. The results of which are of critical importance for the 1,000,000+ unsecured creditors to make their decisions with voting on the APA.

- b) Scandalous or Defamatory Matter: None of the Professional organizations have leaned on this element as an acceptable exception to Federal requirements for open access to court documentation, but as they are the ones being paid to write the motions on behalf of their clients, it would be solely within their capabilities to ensure neither scandalous or defamatory content about their client was included

in their motions/documentation, with the understanding that If a statement is true,  
it cannot be false, and therefore, there is no prima facie case of defamation.

**NOTICE**

15. The Creditors will provide notice of this Motion to the following parties and/or their respective counsel, as applicable: (a) the U.S. Trustee; (b) the Committee; (c) the United States Attorney's Office for the Southern District of New York; (d) the Attorney General in the States where the Debtors conducted their business operations and (e) any party that has requested notice pursuant to Bankruptcy Rule 2002. The Creditors submit, that in light of the nature of the relief requested, no other or further notice need be given.

WHEREFORE, the Creditors respectfully request that the Court grant the requested reliefs herein and such other relief as the Court deems appropriate under the circumstances.

Dated: January 23rd, 2023

**CREDITORS**

/s/ Tracy Hendershott  
Tracy Hendershott  
Florida, USA  
[tokyotracy@gmail.com](mailto:tokyotracy@gmail.com)

/s/ Trevor Brucker  
Trevor Brucker  
Minnesota, USA  
[TrevorBrucker@hotmail.com](mailto:TrevorBrucker@hotmail.com)



**Exhibit A**

**Proposed Order**

**UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK**

_____	)	
In re:	)	Chapter 11
	)	
Voyager Digital Holdings, Inc, et al., <sup>1</sup>	)	Case No. 22-10943 (MEW)
	)	
Creditors	)	(Jointly Administered)
_____	)	

**ORDER REQUIRING UNREDACTED VERSION OF “NOTICE OF FILING OF REDACTED  
OBJECTION OF THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS TO DEBTORS’  
MOTION FOR ENTRY OF AN ORDER APPROVING (I) THE ADEQUACY OF THE AMENDED  
DISCLOSURE STATEMENT, (II) SOLICITATION AND NOTICE PROCEDURES,  
(III) FORMS OF BALLOTS AND NOTICES IN CONNECTION THEREWITH, AND  
(IV) CERTAIN DATES WITH RESPECT THERETO” (DOC #526), TO BE RELEASED INTO  
THE PUBLIC DOMAIN IMMEDIATELY AND FILED ON STRETTO**

Upon the motion (the “Motion”) <sup>2</sup> of the above captioned Creditors and general public for entry of an order (this “Order”), requiring McDermott, Will and Emery to a) unredact court document #526 and b) enter it into the court documentation system via Stretto immediately, IT IS HEREBY ORDERED THAT:

- 1) The Motion granted as set forth herein.
- 2) The Creditors and general public have rights to the unredacted document, pursuant to the Constitution 1st Amendment and sections 105 (a), 107 (b) and 107 ( c) of the Bankruptcy Code, Bankruptcy Rule 9018 and the Local Rule 9018-1.
- 3) Notice of the Motion as provided therein shall be deemed good and sufficient notice of such motion and the requirements of Bankruptcy Rule 6004(a) and the Local Rules are satisfied by such notice.

<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: Voyager Digital Holdings, Inc. (7687); Voyager Digital Ltd. (7224); and Voyager Digital, LLC (8013). The location of the Debtors’ principal place of business is 33 Irving Place, Suite 3060, New York, NY 10003.

<sup>2</sup> Capitalized terms not otherwise defined herein shall have the meaning ascribed to them in the Motion.

- 4) The terms and conditions of this Order shall be immediately effective and enforceable upon its entry.
- 5) The Creditors are authorized to take all actions necessary to effectuate the relief granted in this Order in accordance with the Motion.
- 6) This Court retains exclusive jurisdiction with respect to all matters arising from or related to the enforcement of this Order.
- 7) This Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation and enforcement of this Order.

Dated: \_\_\_\_\_, 2023

New York, New York

---

THE HONORABLE MICHAEL E. WILES  
UNITED STATES BANKRUPTCY JUDGE

**Exhibit B**

**Proposed Order**

**UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK**

_____	)	
In re:	)	Chapter 11
	)	
Voyager Digital Holdings, Inc, et al., <sup>1</sup>	)	Case No. 22-10943 (MEW)
	)	
Creditors	)	(Jointly Administered)
_____	)	

**ORDER REQUIRING UNREDACTED VERSION OF SPECIAL COMMITTEE SUMMARY REPORTS (GENERATED BY QUINN EMANUEL AND FTI CONSULTING) TO BE RELEASED INTO THE PUBLIC DOMAIN IMMEDIATELY AND FILED ON STRETTO**

Upon the motion (the “Motion”) <sup>2</sup> of the above captioned Creditors and general public for entry of an order (this “Order”), requiring agents of Debtors (Quinn Emanuel) and agents of the UCC (FTI Consulting) to a) release unredacted versions of their Special Committee reports of actions of Debtors leading up to Voyager Digital Holdings Inc, et al bankruptcy and b) enter it into the court documentation system via Stretto immediately, IT IS HEREBY ORDERED THAT:

- 1) The Motion granted as set forth herein.
- 2) The Creditors and general public have rights to the unredacted document, pursuant to the Constitution 1st Amendment and sections 105 (a), 107 (b) and 107 ( c) of the Bankruptcy Code, Bankruptcy Rule 9018 and the Local Rule 9018-1.
- 3) Notice of the Motion as provided therein shall be deemed good and sufficient notice of such motion and the requirements of Bankruptcy Rule 6004(a) and the Local Rules are satisfied by such notice.

<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: Voyager Digital Holdings, Inc. (7687); Voyager Digital Ltd. (7224); and Voyager Digital, LLC (8013). The location of the Debtors’ principal place of business is 33 Irving Place, Suite 3060, New York, NY 10003.

<sup>2</sup> Capitalized terms not otherwise defined herein shall have the meaning ascribed to them in the Motion.

- 4) The terms and conditions of this Order shall be immediately effective and enforceable upon its entry.
- 5) The Creditors are authorized to take all actions necessary to effectuate the relief granted in this Order in accordance with the Motion.
- 6) This Court retains exclusive jurisdiction with respect to all matters arising from or related to the enforcement of this Order.
- 7) This Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation and enforcement of this Order.

Dated: \_\_\_\_\_, 2023

New York, New York

---

THE HONORABLE MICHAEL E. WILES  
UNITED STATES BANKRUPTCY JUDGE

**CERTIFICATE OF SERVICE**

I hereby certify that on this 24th day of January 2023, a true and correct copy of the foregoing **MOTION TO RELEASE UNREDACTED VERSION OF “NOTICE OF FILING OF REDACTED OBJECTION OF THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS TO DEBTORS’ MOTION FOR ENTRY OF AN ORDER APPROVING (I) THE ADEQUACY OF THE AMENDED DISCLOSURE STATEMENT, (II) SOLICITATION AND NOTICE PROCEDURES, (III) FORMS OF BALLOTS AND NOTICES IN CONNECTION THEREWITH, AND (IV) CERTAIN DATES WITH RESPECT THERETO” (DOC #526), TO RELEASE SPECIAL COMMITTEE SUMMARY REPORTS INTO INVESTIGATION OF DEBTOR ACTIONS, AND OBJECT TO REDACTION OF “MOTION OF THE DEBTORS FOR ENTRY OF AN ORDER AUTHORIZING THE DEBTORS TO REDACT AND FILE UNDER SEAL CERTAIN CONFIDENTIAL INFORMATION RELATED TO DEBTORS’ OBJECTION TO MOTION OF CELSIUS NETWORK LLC FOR ORDER (I) LIFTING THE AUTOMATIC STAY PURSUANT TO 11 U.S.C. 362(D)(1) AND BANKRUPTCY RULE 4001 AND (II) GRANTING LEAVE TO FILE LATE PROOF OF CLAIM PURSUANT TO BANKRUPTCY RULES 3003(C) AND 9006(B)(1)” (DOC #892)** has been served via-email, as indicated in the attached Service List.

/s/ Tracy Hendershott  
Tracy Hendershott  
Pro Se Creditor

<b>Name</b>	<b>Email</b>	<b>Method of Service</b>
DISTRICT OF COLUMBIA OFFICE OF THE ATTORNEY GENERAL	OAG@DC.GOV	Email
FRANCINE DE SOUSA C/O SISKINDS LLP	<a href="mailto:ANTHONY.OBRIEN@SISKINDS.COM">ANTHONY.OBRIEN@SISKINDS.COM</a> <a href="mailto:MICHAEL.ROBB@SISKINDS.COM">MICHAEL.ROBB@SISKINDS.COM</a> <a href="mailto:GARETT.HUNTER@SISKINDS.COM">GARETT.HUNTER@SISKINDS.COM</a>	Email
GOOGLE, LLC	COLLECTIONS@GOOGLE.COM	Email
OFFICE OF THE UNITED STATES TRUSTEE FOR THE SOUTHERN DIST OF NEW YORK	<a href="mailto:RICHARD.MORRISSEY@USDOJ.GOV">RICHARD.MORRISSEY@USDOJ.GOV</a> MARK.BRUH@USDOJ.GOV	Email
SECURITIES & EXCHANGE COMMISSION	<a href="mailto:SECBANKRUPTCY-OGC-ADO@SEC.GOV">SECBANKRUPTCY-OGC-ADO@SEC.GOV</a> BANKRUPTCYNOTICESCHR@SEC.GOV	Email
SECURITIES & EXCHANGE COMMISSION NEW YORK REGIONAL OFFICE	NYROBANKRUPTCY@SEC.GOV	Email
STATE OF ALABAMA OFFICE OF THE ATTORNEY GENERAL	CONSUMERINTEREST@ALABAMAAG.GOV	Email
STATE OF ALASKA OFFICE OF THE ATTORNEY GENERAL	ATTORNEY.GENERAL@ALASKA.GOV	Email
STATE OF ARIZONA OFFICE OF THE ATTORNEY GENERAL	AGINFO@AZAG.GOV	Email
STATE OF ARKANSAS OFFICE OF THE ATTORNEY GENERAL	OAG@ARKANSASAG.GOV	Email
STATE OF CALIFORNIA OFFICE OF THE ATTORNEY GENERAL	XAVIER.BECERRA@DOJ.CA.GOV	Email
STATE OF COLORADO OFFICE OF THE ATTORNEY GENERAL	CORA.REQUEST@COAG.GOV	Email
STATE OF CONNECTICUT OFFICE OF THE ATTORNEY GENERAL	ATTORNEY.GENERAL@CT.GOV	Email
STATE OF FLORIDA OFFICE OF THE ATTORNEY GENERAL	ASHLEY.MOODY@MYFLORIDALEGAL.CO	Email
STATE OF HAWAII OFFICE OF THE ATTORNEY GENERAL	HAWAIIAG@HAWAII.GOV	Email
STATE OF IDAHO OFFICE OF THE ATTORNEY GENERAL	<a href="mailto:LAWRENCE.WASDEN@AG.IDAHO.GOV">LAWRENCE.WASDEN@AG.IDAHO.GOV</a> AGWASDEN@AG.IDAHO.GOV	Email
STATE OF ILLINOIS OFFICE OF THE ATTORNEY GENERAL	INFO@LISAMADIGAN.ORG	Email
STATE OF IOWA OFFICE OF THE ATTORNEY GENERAL	CONSUMER@AG.IOWA.GOV	Email



STATE OF KANSAS ATTORNEY GENERAL	DEREK.SCHMIDT@AG.KS.GOV	Email
STATE OF LOUISIANA DEPT. OF JUSTICE - ATTORNEY GENERAL'S OFFICE	ADMININFO@AG.STATE.LA.US	Email
STATE OF MAINE OFFICE OF THE ATTORNEY GENERAL	ATTORNEY.GENERAL@MAINE.GOV	Email
STATE OF MARYLAND OFFICE OF THE ATTORNEY GENERAL	OAG@OAG.STATE.MD.US	Email
STATE OF MINNESOTA OFFICE OF THE ATTORNEY GENERAL	ATTORNEY.GENERAL@AG.STATE.MN.US	Email
STATE OF MISSOURI OFFICE OF THE ATTORNEY GENERAL	CONSUMER.HELP@AGO.MO.GOV	Email
STATE OF MONTANA OFFICE OF THE ATTORNEY GENERAL	CONTACTDOJ@MT.GOV	Email
STATE OF NEW HAMPSHIRE OFFICE OF THE ATTORNEY GENERAL	ATTORNEYGENERAL@DOJ.NH.GOV	Email
STATE OF NEW MEXICO OFFICE OF THE ATTORNEY GENERAL	HBALDERAS@NMAG.GOV	Email
STATE OF NORTH DAKOTA OFFICE OF THE ATTORNEY GENERAL	NDAG@ND.GOV	Email
STATE OF OKLAHOMA OFFICE OF THE ATTORNEY GENERAL	QUESTIONS@OAG.OK.GOV	Email
STATE OF OREGON OFFICE OF THE ATTORNEY GENERAL	ELLEN.ROSENBLUM@DOG.STATE.OR.US	Email
STATE OF RHODE ISLAND OFFICE OF THE ATTORNEY GENERAL	AG@RIAG.RI.GOV	Email
STATE OF UTAH OFFICE OF THE ATTORNEY GENERAL	UAG@UTAH.GOV	Email
STATE OF VERMONT OFFICE OF THE ATTORNEY GENERAL	AGO.INFO@VERMONT.GOV	Email
STATE OF VIRGINIA OFFICE OF THE ATTORNEY GENERAL	MAIL@OAG.STATE.VA.US	Email
TORONTO STOCK EXCHANGE	WEBMASTER@TMX.COM	Email
STATE OF WEST VIRGINIA OFFICE OF THE ATTORNEY GENERAL	CONSUMER@WVAGO.GOV	Email
HORWOOD MARCUS & BERK CHARTERED	<a href="mailto:AHAMMER@HMBLAW.COM">AHAMMER@HMBLAW.COM</a> <a href="mailto:NDELMAN@HMBLAW.COM">NDELMAN@HMBLAW.COM</a>	Email
METRPOITAN COMMERCIAL BANK BALLARD SPAHR LLP	SINGERG@BALLARDSPAHR.COM	Email

METROPOLITAN COMMERCIAL BANK WACHTELL, LIPTON, ROSEN & KATZ	<a href="mailto:RGMASON@WLRK.COM">RGMASON@WLRK.COM</a> <a href="mailto:ARWOLF@WLRK.COM">ARWOLF@WLRK.COM</a> <a href="mailto:AKHERRING@WLRK.COM">AKHERRING@WLRK.COM</a>	Email
JASON RAZNICK JAFFE RAITT HEUER & WEISS, P.C.	<a href="mailto:PHAGE@JAFELAW.COM">PHAGE@JAFELAW.COM</a>	Email
STEVE LAIRD FORSHEY & PROSTOK LLP	<a href="mailto:BFORSHEY@FORSHEYPROSTOK.COM">BFORSHEY@FORSHEYPROSTOK.COM</a>	Email
ORACLE AMERICA, INC. BUCHALTER, A PROFESSIONAL CORPORA	<a href="mailto:SCHRISTIANSON@BUCHALTER.COM">SCHRISTIANSON@BUCHALTER.COM</a>	Email
ALAMEDA RESEARCH LLC & AFFILIATES SULLIVAN & CROMWELL LLP	<a href="mailto:DIETDERICHA@SULLCROM.COM">DIETDERICHA@SULLCROM.COM</a> <a href="mailto:GLUECKSTEINB@SULLCROM.COM">GLUECKSTEINB@SULLCROM.COM</a> <a href="mailto:BELLERB@SULLCROM.COM">BELLERB@SULLCROM.COM</a>	Email
VOYAGER DIGITAL HOLDINGS, INC., ET AL. KIRKLAND & ELLIS LLP KIRKLAND & ELLIS INTERNATIONAL LLP	<a href="mailto:JSUSSBERG@KIRKLAND.COM">JSUSSBERG@KIRKLAND.COM</a> <a href="mailto:CMARCUS@KIRKLAND.COM">CMARCUS@KIRKLAND.COM</a> <a href="mailto:CHRISTINE.OKIKE@KIRKLAND.COM">CHRISTINE.OKIKE@KIRKLAND.COM</a> <a href="mailto:ALLYSON.SMITH@KIRKLAND.COM">ALLYSON.SMITH@KIRKLAND.COM</a>	Email
EMERALD OCEAN ISLE, LLC, AMANO GLOBAL HOLDINGS, INC., SHINGO LAVINE, AND ADAM LAVINE C/O GOLDSTEIN & MCCLINKOCK LLLP	<a href="mailto:MATTM@GOLDMCLAW.COM">MATTM@GOLDMCLAW.COM</a> <a href="mailto:HARLEYG@RESTRUCTURINGSHP.COM">HARLEYG@RESTRUCTURINGSHP.COM</a> <a href="mailto:STEVENY@GOLDMCLAW.COM">STEVENY@GOLDMCLAW.COM</a>	Email
EMERALD OCEAN ISLE, LLC, AMANO GLOBAL HOLDINGS, INC., SHINGO LAVINE, AND ADAM LAVINE C/O LAW OFFICES OF DOUGLAS T. TABACHNIK, P.C.	<a href="mailto:DTABACHNIK@DTTLAW.COM">DTABACHNIK@DTTLAW.COM</a>	Email
MATTHEW EDWARDS C/O LIZ GEORGE AND ASSOCIATES	<a href="mailto:GEORGELAWOK@GMAIL.COM">GEORGELAWOK@GMAIL.COM</a>	Email
TEXAS STATE SECURITIES BOARD OFFICE OF THE ATTORNEY GENERAL OF TEXAS	<a href="mailto:ABIGAIL.RYAN@OAG.TEXAS.GOV">ABIGAIL.RYAN@OAG.TEXAS.GOV</a> <a href="mailto:LAYLA.MILLIGAN@OAG.TEXAS.GOV">LAYLA.MILLIGAN@OAG.TEXAS.GOV</a> <a href="mailto:JASON.BINFORD@OAG.TEXAS.GOV">JASON.BINFORD@OAG.TEXAS.GOV</a>	Email
OFFICE OF THE ATTORNEY GENERAL OF TEXAS	<a href="mailto:ROMA.DESAI@OAG.TEXAS.GOV">ROMA.DESAI@OAG.TEXAS.GOV</a>	Email
OFFICE OF THE ATTORNEY GENERAL BANKRUPTCY DIVISION	<a href="mailto:AGBANKNEWYORK@AG.TN.GOV">AGBANKNEWYORK@AG.TN.GOV</a>	Email
VERMONT DEPARTMENT OF FINANCIAL REGULATION ASSISTANT GENERAL COUNSEL	<a href="mailto:JENNIFER.ROOD@VERMONT.GOV">JENNIFER.ROOD@VERMONT.GOV</a>	Email
ROBERT SNYDERS & LISA SNYDERS C/O JOHNSON, POPE, BOKOR, RUPPEL & BURNS, LLP	<a href="mailto:ANGELINAL@JPFIRM.COM">ANGELINAL@JPFIRM.COM</a>	Email
MICHAEL LEGG C/O MCCARTHY, LEBIT, CRYSTAL & LIFFMAN CO.	<a href="mailto:RRK@MCCARTHYLEBIT.COM">RRK@MCCARTHYLEBIT.COM</a> <a href="mailto:NRO@MCCARTHYLEBIT.COM">NRO@MCCARTHYLEBIT.COM</a>	Email
MICHAEL GENTSCH C/O BARSKI LAW PLC	<a href="mailto:CBARSKI@BARSKILAW.COM">CBARSKI@BARSKILAW.COM</a>	Email

ILLINOIS SECRETARY OF STATE C/O OFFICE OF THE ATTORNEY GENERAL	JOHN.REDING@ILAG.GOV	Email
GEORGIA DEPARTMENT OF BANKING AND FINANCE	NHOVEY@LAW.GA.GOV	Email
MARK CUBAN AND DALLAS BASKETBALL LIMITED, D/B/A DALLAS MAVERICKS C/O BROWN RUDNICK LLP ATTN: SIGMUND S. WISSNERGROSS ESQ. & KENNETH J. AULET	<a href="mailto:SWISSNER-GROSS@BROWNRUDNICK.COM">SWISSNER-GROSS@BROWNRUDNICK.COM</a> KAULET@BROWNRUDNICK.COM	Email
MARK CUBAN AND DALLAS BASKETBALL LIMITED D/B/A DALLAS MAVERICKS C/O BROWN RUDNICK LLP ATTN: STEPHEN A. BEST ESQ & RACHEL O. WOLKINSON, ESQ.	<a href="mailto:SBEST@BROWNRUDNICK.COM">SBEST@BROWNRUDNICK.COM</a> <a href="mailto:RWOLKINSON@BROWNRUDNICK.COM">RWOLKINSON@BROWNRUDNICK.COM</a>	Email
ED BOLTON C/O AKERMAN LLP	<a href="mailto:ADAM.SWICK@AKERMAN.COM">ADAM.SWICK@AKERMAN.COM</a> <a href="mailto:JOHN.THOMPSON@AKERMAN.COM">JOHN.THOMPSON@AKERMAN.COM</a> <a href="mailto:JOANNE.GELFAND@AKERMAN.COM">JOANNE.GELFAND@AKERMAN.COM</a>	Email
JON GIACOBBE ATTN: A. MANNY ALICANDRO	MANNY@ALICANDROLAWOFFICE.COM	Email
WELLS FARGO BANK, N.A. C/O ALDRIDGE PITE, LLP	GWALLACH@ALDRIDGEPITE.COM	Email
AD HOC GROUP OF EQUITY INTEREST HOLDERS C/O KILPATRICK TOWNSEND & STOCKTON LLP	<a href="mailto:DPOSNER@KILPATRICKTOWNSEND.COM">DPOSNER@KILPATRICKTOWNSEND.COM</a> <a href="mailto:KMOYNIHAN@KILPATRICKTOWNSEND.COM">KMOYNIHAN@KILPATRICKTOWNSEND.COM</a> PROSENBLATT@KILPATRICKTOWNSEND .COM	Email
PIERCE ROBERTSON C/O PACHULSKI STANG ZIEHL & JONES LLP	<a href="mailto:RPACHULSKI@PSZJLAW.COM">RPACHULSKI@PSZJLAW.COM</a> <a href="mailto:AKORNFELD@PSZJLAW.COM">AKORNFELD@PSZJLAW.COM</a> <a href="mailto:DGRASSGREEN@PSZJLAW.COM">DGRASSGREEN@PSZJLAW.COM</a> JROSELL@PSZJLAW.COM	Email
STATE OF WASHINGTON OFFICE OF ATTORNEY GENERAL	STEPHEN.MANNING@ATG.WA.GOV	Email
MARCUM LLP MINTZ & GOLD LLP	GOTTESMAN@MINTZANDGOLD.COM	Email
U.S. SECURITIES & EXCHANGE COMMISSION	SCHEUERT@SEC.GOV	Email
NEW YORK STATE DEPARTMENT OF FINANCIAL SERVICES CONSUMER PROTECTION AND FINANCIAL ENFORCEMENT	<a href="mailto:KEVIN.PUVALOWSKI@DFS.NY.GOV">KEVIN.PUVALOWSKI@DFS.NY.GOV</a> <a href="mailto:LINDA.DONAHUE@DFS.NY.GOV">LINDA.DONAHUE@DFS.NY.GOV</a> JASON.STJOHN@DFS.NY.GOV	Email
NEW JERSEY BUREAU OF SECURITIES	<a href="mailto:VSHEA@MDMC-LAW.COM">VSHEA@MDMC-LAW.COM</a> NLEONARD@MDMC-LAW.COM	Email
NEW JERSEY BUREAU OF SECURITIES		Email

USIO, INC. PULMAN, CAPPuccio & PULLEN, LLP	RPULMAN@PULMANLAW.COM	Email
BAM TRADING SERVICES INC. D/B/A BINANCE.US LATHAM & WATKINS	<a href="mailto:ADAM.GOLDBERG@LW.COM">ADAM.GOLDBERG@LW.COM</a> NACIF.TAOUSSE@LW.COM <a href="mailto:JON.WEICHSELBAUM@LW.COM">JON.WEICHSELBAUM@LW.COM</a> ANDREW.SORKIN@LW.COM	Email
ATTORNEY FOR THE STATES OF ALABAMA, ARKANSAS, CALIFORNIA, DISTRICT OF COLUMBIA, HAWAII, MAINE, NORTH DAKOTA, OKLAHOMA, AND SOUTH C/O NATIONAL ASSOCIATION OF ATTORNEYS GENERAL	KCORDRY@NAAG.ORG	Email
USIO, INC. & FICENTIVE, INC. RUSKIN MOSCOU FALTISCHEK, P.C.	SGIUGLIANO@RMFPC.COM	Email
CELSIUS NETWORK LLC AKIN GUMP STRAUSS HAUER & FELD, L.L.P.	MHURLEY@AKINGUMP.COM DCHAPMAN@AKINGUMP.COM	Email
VOYAGER DIGITAL HOLDINGS, INC., ET AL. PAUL HASTINGS LLP	<a href="mailto:JONCANFIELD@PAULHASTINGS.COM">JONCANFIELD@PAULHASTINGS.COM</a> MATTMURPHY@PAULHASTINGS.COM MICHAELCWHALEN@PAULHASTINGS.COM	Email